

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ANDREW BLACK

Criminal No. 2:23-cr-115

(21 U.S.C. § 846; 18 U.S.C. § 1341)

INFORMATION

COUNT ONE

The United States Attorney charges that:

On or about March 31, 2020, in the Western District of Pennsylvania, the defendant, ANDREW BLACK, did knowingly, intentionally, and unlawfully attempt to possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT TWO

The United States Attorney further charges that:

THE SCHEME AND ARTIFICE

1. From in and around January 2018, and continuing thereafter to on or about March 31, 2020, in the Western District of Pennsylvania, and elsewhere, the defendant, ANDREW BLACK, devised and intended to devise a scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses, representations and promises, well knowing at the time that the pretenses, representations and promises were false and fraudulent when made.

2. It was part of the scheme and artifice to defraud that the defendant, ANDREW BLACK, fraudulently obtained the personal identifying information of victims.

3. It was further part of the scheme and artifice to defraud that the defendant, ANDREW BLACK, used the fraudulently obtained personal identifying information to open bank accounts in his victims' names, frequently using his own residence address as the accountholder's address.

4. It was further part of the scheme and artifice to defraud that, with respect to certain victims, the defendant, ANDREW BLACK, fraudulently instructed the United States Postal Service that his victims had moved to his residence address, causing his victims' mail to be forwarded to his residence address, thereby ensuring his victims did not learn of the fraudulently opened accounts.

5. It was further part of the scheme and artifice to defraud that the defendant, ANDREW BLACK, received debit cards through the United States mail drawing on fraudulently opened bank accounts in his victims' names.

6. It was further part of the scheme and artifice to defraud that the defendant, ANDREW BLACK, attempted to deposit fraudulent checks in the bank accounts he opened in his victims' names, and fraudulently wrote checks drawing on the accounts in his victims' names.

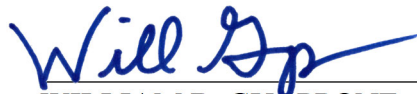
THE MAILING

7. In and around August 2018, in the Western District of Pennsylvania, the defendant, ANDREW BLACK, for the purposes of executing and attempting to execute the aforesaid scheme and artifice to defraud, and in attempting to do so, did cause to be placed in an authorized depository for United States mail, mail matter addressed to Victim 1, to be delivered by the United States Postal Service according to the directions thereon. That is, the defendant, ANDREW BLACK, caused to be mailed to Victim 1 at the defendant's residence address, a debit card in Victim 1's name.

In violation of Title 18, United States Code, Section 1341.



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